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March 31, 2022

VIA CM/ECF

The Honorable Maryellen Noreika
United States District Court, District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Unit 19
Room 4324
Wilmington, DE 19801-3555

Re: *CBV, Inc. v. ChanBond, LLC, et al.*, C.A. No. 1:21-cv-01456

Dear Judge Noreika:

I write on behalf of Plaintiff CBV, Inc. ("CBV") regarding the *Emergency Motion for Extension of Time to Respond to Leane Defendants' Motion for Judgment on the Pleadings* (the "Motion") that CBV filed contemporaneously with this letter.

CBV's responsive brief to Deirdre Leane and IPNAV, LLC's Motion for Judgment on the Pleadings is currently due to be filed on Tuesday June 7, 2022. CBV's Delaware counsel are currently in trial, through Friday June 3, 2022, in the Delaware Superior Court before The Honorable Mary Miller Johnston. In addition, CBV's out-of-state counsel is travelling in Europe for business through June 12, 2022. As such, good cause exists to grant CBV's requested extension.

CBV filed its Motion as an emergency motion given that its responsive brief is due only one week from today. Given the short time frame, CBV respectfully requests that the Court issue a prompt ruling on the Motion.

Should Your Honor have any questions or require anything further, counsel remains available at Your Honor's convenience.

Respectfully submitted,

/s/ *Geoffrey G. Grivner*

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cc: All Counsel of Record (via CM/ECF)